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OF NEW YORK, INC.**

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Southern District of New York  
*Jennifer L. Brown*  
Attorney-in-Charge

August 19, 2021

**By ECF**

Honorable Valerie Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

**Re: *United States v. Kamel Osborne*, 19 Cr. 931 (VEC)**

Dear Judge Caproni:

I represent Kamel Osborne in the above-captioned case, which was reassigned to Your Honor on August 13, 2021. With the consent of Pretrial Services, I write to request a postponement of Mr. Osborne's voluntary surrender date. The Government takes no position.

On February 4, 2021, Judge William H. Pauley, III sentenced Mr. Osborne to 24 months' incarceration and set a voluntary surrender date of August 25, 2021. On August 16, 2021, Mr. Osborne was notified that he has been designated to surrender to FCI Danbury by 10:00 a.m. on August 25, 2021. Mr. Osborne respectfully requests that the Court postpone his voluntary surrender to a date in January 2022, to allow him additional time to work and save money to assist his family before he serves his sentence.

As noted, the Government takes no position on this request, and Pretrial Services consents to the proposed extension. In addition, Pretrial requests that the Court authorize the removal of Mr. Osborne's ankle monitor one day before he is ordered to surrender. Thank you for considering these requests.

Respectfully submitted,

/s/ Ariel Werner  
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cc: Rebecca Dell, Assistant U.S. Attorney

Mr. Osborne must surrender by 10:00 A.M. on **September 27, 2022**. Pre-trial Services' request to remove Mr. Osborne's ankle bracelet one day before his surrender date is granted.

SO ORDERED.



Date: August 20, 2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE